01-000039

# STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH HEALTHCARE SYSTEMS BRANCH

In re: Ernest Squatrito, D.O.

Petition No. 2005-0722-001-187

## STATEMENT OF CHARGES

Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Ernest Squatrito, D.O.:

#### **COUNT ONE**

- 1. Ernest Squatrito of Manchester, Connecticut (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut license number 000536 to practice medicine and surgery.
- 2. Commencing in April 2005, respondent treated a female patient, D.T., primarily for complaints of chronic back pain.
- 3. Respondent engaged in unprofessional conduct when using inappropriate language to inquire as to D.T.'s libido (e.g., asking her if she was "horny") in connection with evaluating a course of treatment for D.T.'s chronic back pain.
- 4. Respondent engaged in unprofessional conduct when informing D.T. of an alleged sexual relationship between respondent's former practice partner and an employee at a physical therapy office adjacent to respondent's practice.
- 5. The above described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-13c, including, but not limited to, §20-13c(4).

#### **COUNT TWO**

- 6. Paragraphs 1 and 2 are incorporated herein by reference as if set forth in full.
- 7. Respondent deviated from the standard of care when recommending Actiq® (oral transmucosal fentanyl citrate) for treatment of D.T.'s pain.
- 8. Respondent failed to discuss and/or document in D.T.'s medical record any discussion of the side effects and/or risks associated with the prescription of Kadian, a Schedule II narcotic, for D.T.'s pain.
- 9. The above described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-13c, including, but not limited to, §20-13c(4).

#### COUNT THREE

- 10. Paragraph 1 is incorporated herein by reference as if set forth in full.
- 11. Respondent engaged in unprofessional conduct when referring to an employee at a physical therapy office adjacent to respondent's practice as a "porn star" and/or pulling on said individual's clothing to view a portion of her bra.
- 12. The above described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-13c, including, but not limited to, §20-13c(4).

### **COUNT FOUR**

- 13. Paragraph 1 is incorporated herein by reference as if set forth in full.
- 14. Respondent engaged in unprofessional conduct when commenting to a female patient, P.A., that she had a "nice rack" (in reference to patient P.A.'s breasts).
- 15. The above described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-13c, including, but not limited to, §20-13c(4).

THEREFORE, the Department prays that:

The Connecticut Medical Examining Board, as authorized in §§19a-17 and 20-13c, revoke or order other disciplinary action against the medical license of Ernest Squatrito as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this	4th	day of _	January	2007.
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Jennifer Filippone, Section Chief Practitioner Licensing and Investigations

Healthcare Systems Branch